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*Attorneys for Plaintiff Terry Turner*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

12 TERRY TURNER, individually, and on behalf  
13 of other members of the general public  
similarly situated,

14 Plaintiff,

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15 SOLV ENERGY, LLC, a Delaware limited  
16 liability company; and DOES 1 through 100,  
inclusive;

## Defendants.

Case No.: 1:23-cv-01526-KES-CDB

## PUTATIVE CLASS ACTION

Honorable Kirk E. Sherriff

**STIPULATION AND ORDER TO  
REMAND REMOVED ACTION**

Complaint Filed: July 14, 2023  
Removal Filed: October 25, 2023  
Trial Date: None Set

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17 *Attorneys for Defendant Solv Energy, LLC*

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1           TERRY TURNER (“Plaintiff”) and SOLV ENERGY, LLC (“Defendant”)  
2 (collectively “the Parties”) stipulate as follows:

3           1.       WHEREAS, on July 14, 2023, Plaintiff commenced an action in the  
4 Superior Court of California, County of Kern, entitled TERRY TURNER, individually, and  
5 on behalf of other members of the general public similarly situated; SOLV ENERGY, LLC, a  
6 Delaware limited liability company; and DOES 1 through 100, inclusive; Defendants (Case  
7 No. BCV-23-102287) (“Action”).

8           2.       WHEREAS, on October 25, 2023, the Action was removed to the United  
9 States District Court for the Eastern District of California (Case No. 1:23-cv-01526-KES-  
10 CDB).

11           3.       WHEREAS, on June 9, 2025, the Parties attended a mediation with the  
12 mediator Lisa Klerman and reached an agreement on the principal terms to settle this Action  
13 via a mediator’s proposal.

14           4.       WHEREAS, in connection with the settlement of the Action, the Parties  
15 agreed to stipulate to remand this Action back to the Superior Court of California, County of  
16 Kern.

17           5.       WHEREAS, the Parties agreed that each party shall bear its own  
18 attorneys’ fees and costs with respect to the removal and subsequent remanding of this Action  
19 pursuant to this stipulation and order.

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1 NOW THEREFORE, the Parties hereby stipulate and jointly request that the Court  
2 issue an order as follows:

3 1. This Action is remanded back to the Superior Court of California, County  
4 of Kern; and

5 2. Each party shall bear its own attorneys' fees and costs with respect to the  
6 removal and subsequent remanding of this Action pursuant to this Stipulation and Order.

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8 **IT IS SO STIPULATED.**

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10 Dated: August 7, 2025

**JUSTICE LAW CORPORATION**

11  
12 By: /s/ Douglas Han  
13 Douglas Han  
14 Shunt Tatavos-Gharajeh  
15 Christopher Petersen  
16 *Attorneys for Plaintiff*

17 Dated: August 4, 2025

**LITTLER MENDELSON P.C.**

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19 By: /s/ James Payer (as authorized on  
20 August 4, 2025)  
21 Elizabeth Staggs-Wilson  
22 James Payer  
23 Rachael Lavi  
24 *Attorney for Defendant*

1 **ORDER**  
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4 Upon Consideration of the stipulation, it is hereby ordered that this Action is  
5 REMANDED to the Superior Court of California, County of Kern. Each party shall bear  
6 their own attorneys' fees and costs in connection with the removal and subsequent  
remanding of this Action.

7 The Clerk of the Court is directed to mail a copy of this order to the clerk of the  
8 Superior Court, County of Kern and to close this case.

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10 IT IS SO ORDERED.  
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12 Dated: August 7, 2025

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14 UNITED STATES DISTRICT JUDGE  
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STIPULATION AND ORDER TO REMAND